

GIBSON LAW FIRM, PLLC  
Sujata S. Gibson, Esq.  
408 W Martin Luther King, Jr. St.  
Ithaca, NY 14850

NELSON MADDEN BLACK LLP  
Jonathan R. Nelson, Esq.  
475 Park Ave. S., Suite 2800  
New York, NY 10016

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August 17, 2022

**By ECF**

Hon. Diane Gujarati  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *New Yorkers For Religious Liberty, Inc. et al., v. The City of New York, et al.*,  
Case No.: 22-cv-00752-DG-VMS

Dear Judge Gujarati:

Pursuant to Rule 62(d), Plaintiffs request that this Court grant an injunction as requested in our recent motion papers or, alternatively, a stay of enforcement of the Defendants' Mandates, as identified in Plaintiffs' First Amended Complaint against Plaintiffs and the proposed class identified in said complaint, pending interlocutory appeal of this Court's August 11, 2022 Order denying Plaintiffs' motion for a preliminary injunction, which Plaintiffs have appealed to the Court of Appeals.

Plaintiffs rely on the papers submitted previously in support of the aforesaid motion. Each day represents fresh ongoing irreparable harm, as Plaintiffs and their colleagues are forced to choose between their faith and their job, in violation of the First Amendment. Loss of such First Amendment rights "for even minimal periods of time, unquestionably constitutes irreparable injury." *Elrod v. Burns*, 427 US 347, 373 (1976).

Respectfully submitted,

*/s/ Jonathan R. Nelson*  
Counsel for Plaintiffs

*/s/ Sujata S. Gibson*  
Counsel for Plaintiffs

cc: All counsel via ECF